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7 *Counsel for the Pension Funds and*

8 *Lead Counsel for the Class*

9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **OAKLAND DIVISION**

12 BEN BROWNBAC, Individually and on
13 Behalf of All Others Similarly Situated,

14 Plaintiff,

15 vs.

16 APPLOVIN CORPORATION, et al.,

17 Defendants.

Case No. 4:25-cv-02772-HSG

CLASS ACTION

JOINT STIPULATION AND ORDER
REGARDING THE SCHEDULE FOR
FILING THE AMENDED CLASS
ACTION COMPLAINT AND
DEFENDANTS' RESPONSE THERETO

1 Lead Plaintiffs Northern California Pipe Trades Trust Funds and Monroe County Employees’
2 Retirement System (together, “Lead Plaintiffs” or the “Pension Funds”) and defendants AppLovin
3 Corporation, Adam Foroughi, Herald Chen, and Matthew Stumpf (collectively, “Defendants”),
4 through their undersigned counsel hereby agree to and stipulate pursuant to Local Rule 6-2, to the
5 following schedule for Lead Plaintiffs’ filing of an amended complaint and Defendants’ response
6 thereto:

7 WHEREAS, on March 24, 2025, Ben Brownback filed a complaint in the Northern District
8 of California (ECF 1);

9 WHEREAS, on June 30, 2025, the Court appointed the Pension Funds as Lead Plaintiffs,
10 approved their selection of Grant & Eisenhofer P.A. and Robbins Geller Rudman & Dowd LLP as
11 Lead Counsel for the putative class, and ordered the parties to submit a stipulation and proposed
12 order regarding the schedule for the filing of an amended complaint and the filing of Defendants’
13 response (ECF 39); and

14 WHEREAS, the parties subsequently conferred and have agreed to the schedule set forth
15 below.

16 NOW, THEREFORE, THE PARTIES HEREBY STIPULATE AND AGREE, and request
17 the Court enter the following schedule:

- 18 1. Lead Plaintiffs shall file an amended complaint by September 12, 2025;
- 19 2. Defendants shall file their response to the amended complaint by November 14, 2025;
- 20 3. In the event Defendants move to dismiss the amended complaint, Lead Plaintiffs shall
21 file an opposition to the motion to dismiss by January 12, 2026; and
- 22 4. In the event Defendants move to dismiss the amended complaint, Defendants shall
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- 24
- 25
- 26
- 27

1 file any reply in further support of their motion to dismiss by February 2, 2026.

2 DATED: July 10, 2025

3 /s/ J. Marco Janoski Gray

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5 J. Marco Janoski Gray (Cal. Bar Id. 306547)
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26 DATED: July 10, 2025

27 /s/ Karin E. Fisch

28 Karin E. Fisch (admitted *pro hac vice*)
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*Counsel for the Pension Funds and
Lead Counsel for the Class*

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10 *Additional Counsel*

11 DATED: July 10, 2025

12 /s/ Hope D. Skibitsky

13 Alexander Benjamin Spiro (*pro hac vice*)

14 Hope D. Skibitsky (*pro hac vice*)

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Corporation, Adam Foroughi, Herald Chen, and


Matthew Stumpf

* * *

ORDER

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

DATED: 7/10/2025


THE HONORABLE HAYWOOD S. GILLIAM, JR.
UNITED STATES DISTRICT JUDGE

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